



Arizona Comparability Handbook

Determining Comparability of Title I Schools Compliance Guide

Elementary and Secondary Education Act Section 1120A(c)

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Table of Contents

COMPARABLE FUNDING FOR TITLE I SCHOOLS	3
Purpose.....	3
Requirement.....	3
Criteria Covered In This Guide.....	3
Important Dates for Comparability Criteria.....	3
REQUIRED CRITERIA	4
Written Policy & Procedures	4
Testing Comparability	4
Supporting Documentation Guidelines	4
Exemptions and Exclusions	5
Using the Worksheet for Calculations	5
Adjusting Allocations to Non-Comparable Title I Schools	5
Documentation Retention	6
Assurance of Comparability	6

COMPARABLE FUNDING FOR TITLE I SCHOOLS

Purpose

Federal Title I Grants are intended to provide supplemental programs to disadvantaged students. To ensure that these awards are used for additional programs, fiscal law requires that all Title I schools receive a “fair share” of State and Local education funds.

Non-compliance will cause a Local Education Agency (LEA) to become ineligible for receipt of Title I funds. Consequences also include a hold on grant funds as well as a requirement to return funds.

Requirement

LEAs may receive Title I, Part A funds only if it uses State and Local funds to provide services in Title I schools that, taken as a whole, are at least comparable to the services provided in schools that are not receiving Title I funds. If an LEA serves all of its schools with Title I funds, the LEA must use State and Local funds to provide services that, **taken as a whole compared with all sites**, are substantially comparable in each Title I school.

Exemptions

Single site LEAs and any LEA with only one school site per grade span are exempt from calculating comparability. A template can be found on ALEAT with guidance on the exemption documentation required.

Criteria Covered In This Guide

- **Writing and annually updating Policy & Procedures** for compliance with the comparability requirement;
- **Annually testing comparability** (if not exempt) of its schools in the fall and adjusting resource allocations to meet compliance, as necessary;
- **Annually documenting compliance**;
- **Reporting an Assurance of Comparability** to the Arizona Department of Education (ADE) by November 30th every two years.

Important Dates for Comparability Criteria

All calculations and documentation should be completed early in the school year. The due date for submitting your calculation or submitting your exemption forms into ALEAT is November 30th. The due date for completing the Assurance of Comparability in Academic Achievement reports is also November 30th. If your LEA is found to be non-comparable, reallocating of resources must be completed.

Reallocations must be completed by December 31st. If non-comparable Title I schools are not corrected in a timely manner to meet compliance, the State may withhold or require repayment of Title I funds.

REQUIRED CRITERIA

Written Policy & Procedures

All LEAs receiving Title I funds, **regardless if they are exempt or excluded of calculating comparability**, must establish procedures in writing. Procedures will have sufficient detail to show a year-round effort to use comparable State and Local funds at all schools. Exempt LEAs and LEAs where all of their sites can be excluded still need to establish a timeline for submitting the Assurance of Comparability, retaining documentation, and reviewing the procedures.

For non-exempt LEAs the following should be explained in your Policy & Procedures:

- A yearly timeline for demonstrating compliance.
- Identify the person responsible (including their position) for making and documenting the calculations.
- Choose and describe which resource (staff, salaries, or expenses) will be compared to the student population to determine comparability. If an LEA is to utilize an alternative method it must be discussed and approved by ADE.
- A remedy to make resource adjustments when schools are not comparable.

Testing Comparability

Supporting Documentation Guidelines

ADE requires that student counts be the LEAs 40th day enrollment. The staffing and expense reports must be measured on or near the same date. All staffing reports used for calculations should only consider **Instructional Staff as long as the snapshot being used for each site is within the same context**. Any staffing positions counted must be represented at more than one site (if applicable) in the district. **Pre-K should be excluded from any student and staffing reports and calculations**.

Instructional Staff may include more than just teachers. For example the following personnel may also be included in the count: other certified staff (principals, guidance counselors, speech therapists, school social workers, specialists, school psychologists, librarians, etc.), instructional paraprofessionals and instructional support clerical staff. The following personnel may not be included in staffing counts: cafeteria workers, custodians, nurses, playground aides, student teachers, volunteers, etc.

Staffing counts used in calculations must then subtract out any federally funded (Title I, SPED, ELL, etc.) FTEs and indicate any federally funded positions on the supporting documentation.

For any expense reports used in calculations, all sources of State and Local funds must be included with the exception of;

- Any State or local funds used for supplemental purposes that meet the same intent and purpose as Title I.
- State and Local expenditures for language instruction educational programs.
- The excess costs of providing services to children with disabilities as determined by the LEA.

Exemptions and Exclusions

Please refer to the following link if your LEA has exemptions and exclusions:

<http://www.azed.gov/no-child-left-behind/files/2013/07/comparability-exemption-template.doc>

Using the Worksheet for Calculations

Arizona Department of Education will recognize the following methods of providing comparability that are permissible under the federal law and the February 2008 Federal Non-Regulatory Fiscal Requirements guidance.

The acceptable methods to compare schools include:

1. Pupil/Instructional Staff ratio at Title I schools - *Recommended*
2. Pupil/Instructional Staff ratio at Title I to Non-Title I schools - *Recommended*
3. Pupil/Instructional Staff ratio at Title I schools by grade span
 - a. Grade Spans must match the basic organization of the LEA and have school buildings with at least two overlapping grades
4. Pupil/Instructional Staff ratio at Title I schools by large and small schools
5. Pupil/Instructional Staff ratio at Title I schools by poverty level (high to low)
6. State and Local per pupil spending at Title I schools (all expenditures)

Only method two can be used if you are comparing Title I to Non-Title I schools. All of these methods can be further broken down by grade span, school size, or other logical methods as long as supporting documentation can provide justification. **An LEA may not divide schools to exclude a site from a calculation. All sites must be included in a calculation unless it has 100 or less students.**

If an initial testing method identifies one or more Title I schools that are not comparable, every testing method may be used until the LEA proves comparability. If no methodology is able to show comparability, the LEA should then reallocate resources to make it comparable. **Resource reallocations must be completed by December 31st.**

Adjusting Allocations to Non-Comparable Title I Schools

Resource reallocation consists of reassigning State and Locally funded instructional staff, or of transferring materials and supplies to other schools within the LEA. The LEA should follow its written comparability procedures to correct any imbalance of resources in Title I schools. **Any corrections must be completed by December 31st. If any non-comparable Title I schools are not corrected in a timely manner, the state may withhold or require repayment of Title I funds.**

Documentation

LEA documentation must be uploaded into ALEAT every other year in conjunction with Comparability. This is reported through in instrument in ALEAT which is monitored every other year.

The following documentation is required to show **annual** compliance:

- Written comparability procedures
- LEA 40th day student enrollment counts
- Supporting staff and/or expense records snapshot around the 40th day enrollment period
- Worksheet
- Resource reallocation supporting documentation (if needed)

Assurance of Comparability

The Assurance of Comparability is required by all LEAs receiving Title I funds regardless of exemption status. It notifies the State that its schools are comparable **every other year**.

The biannual schedule is:

- LEAs starting with the letter **A to L** will report on **November 30th** of **even** years.
- LEAs starting with the letter **M to Z** will report on **November 30th** of **odd** years.

The report can be found in the **COMMON LOGON** under Academic Achievement Reports. The reports are titled 'FY20XX Assurance of Comparability – LEAs beginning with Letters...' with the XX for the current fiscal year.